

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA  
3

4 PlayUp, Inc., a Delaware corporation,

5 Plaintiff,

6 v.

7 Dr. Laila Mintas, an individual,

8 Defendant.

9  
10 Dr. Laila Mintas, an individual,

11 Counterclaimant,

12 v.

13 PlayUp, Inc., a Delaware corporation; PlayUp  
14 Ltd., an Australian company; Daniel Simic,  
15 an individual,

Counterdefendants.

Case No. 2:21-cv-02129-GMN-NJK

**UNOPPOSED REQUEST, JOINT  
STIPULATION AND PROPOSED ORDER  
TO EXTEND LIMITED DISCOVERY  
PURSUANT TO LOCAL RULE IA 6-1 AND  
LOCAL RULE 26-3**

**[FOURTH REQUEST AS TO ECF NO. 385]**

16 Plaintiff PlayUp Inc. (“PlayUp US”), Counter-defendant Daniel Simic and Defendant Dr.  
17 Laila Mintas (“Mintas”) (and collectively with PlayUp, the “Parties”), by and through their counsel  
18 of record, hereby submit this unopposed request and joint stipulation to extend the time to conduct  
19 depositions in the case pursuant to Local Rule IA 6-1 and Local Rule 26-3, along with a proposed  
20 order. This is the fourth request for an extension of the discovery plan entered as ECF No. 385,  
21 and it is entered into in good faith and for no dilatory purpose. The purpose of this Unopposed  
22 Request and its accompanying Joint Stipulation is to resolve the current discovery dispute raised  
23 in Mintas’ Motion to Extend the April 1, 2024 Discovery Deadline (ECF No. 488), and the Court’s  
24 recent order directing full briefing by this Friday, March 15, 2024 (ECF No. 490).

25 **I. REQUEST**

26 1. On March 8, 2024, Dr. Mintas filed her Motion to Extend the April 1, 2024,  
27 Discovery Deadline, seeking to extend the deadline for oral discovery in this case. ECF No. 488.  
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1           2.       Subsequently, the Court ordered expedited briefing on the Motion. (ECF No. 490).  
2       To avoid protracted litigation and mindful of the Court's prior directions to resolve discovery  
3       disputes without the intervention of the Magistrate Court, counsel for Play Up US and Mr. Simic,  
4       Mr. Popok, contacted counsel for Mintas, and proposed a resolution to the dispute that would  
5       provide an extension of the current discovery cut off deadline from April 1, 2024 through and  
6       including May 10, 2024, on the conditions noted in the Joint Stipulation below.

7           3.       The Parties subsequently conducted a telephonic meet and confer, engaged in  
8       additional good faith discussions over email, and reached agreement on Mr. Popok's proposal  
9       which is the subject of this submission.

## 10       **II.       DISCOVERY STATUS**

### 11       **A.       Discovery that Has Been Completed**

- 12           1.       The parties have exchanged mandatory initial disclosures and supplements thereto.
- 13           2.       PlayUp US has served upon Mintas a First Set of Interrogatories, Second Set of  
14               Interrogatories, First Set of Requests for Production of Documents, Second Set of  
15               Requests for Production of Documents, Third Set of Requests for Production of  
16               Documents, and Third Set of Interrogatories. Mintas has responded to discovery  
17               requests.
- 18           3.       Mintas has served upon PlayUp US a First Set of Requests for Production of  
19               Documents, Second Set of Requests for Production of Documents, Third Set of  
20               Requests for Production of Documents, Fourth Set of Requests for Production of  
21               Documents, Fifth Set of Requests for Production of Documents, First Set of  
22               Interrogatories, Second Set of Interrogatories, and Third Set of Interrogatories.  
23               PlayUp US has responded to the discovery requests.
- 24           4.       Mintas has served upon Mr. Simic a First Set of Requests for Production of  
25               Documents, Second Set of Requests for Production of Documents, Third Set of  
26               Requests for Production of Documents, First Set of Interrogatories, and Second Set  
27               of Interrogatories and served on PlayUp Ltd. a First Set of Requests for Production  
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of Documents, Second Set of Requests for Production of Documents, and Third Set of Requests for Production of Documents. Simic and PlayUp Ltd. have responded to the discovery requests.

5. The following depositions have been completed: Laila Mintas, Feridun Mintas, PlayUp Inc.'s 30(b)(6) designee, Jeremy Kleiman, Christopher Cheung, Jamie Blankenship, Adrianna Samuels, Cameo Ramirez, Magdalena Rudzka, Mia Raffa, Michel Costa, Richard Sapsford, and experts Thomas Salerno, C.J. Fisher, and Pablo Pena.

6. The following subpoenas duces tecum have been served and/or pending service: Adrianna Cuccinelli Samuels, Nevada Gaming Commission, Nevada Gaming Control Board, Sportradar, Bally's Corporation, Anastacia Pederson, Art Hamilton, Cameo Ramirez, DocuSign, Dennis Drazin, Esq., Kevin Smith, Michael Roselli, PlayEngine, Quinlan Law Firm, Quinton Singleton, Esq., Mia Raffa, Feridun Mintas, Chris Cheung, Jamie Blankenship, Naylor & Braster, FTX Party Limited, Caesar's Entertainment, and Bank of George.

7. Mintas also served a subpoena duces tecum on Zumpano Patricios Helsten & Popok, PLLC. A Motion as to that subpoena is pending.

8. Additionally, Dr. Mintas noticed the deposition of Michael S. Popok, Esq, but that deposition was vacated pending the Court's decision on PlayUp US' and Mr. Simic's Motion for Protective Order. ECF No. 465.

9. Mintas served five initial expert disclosures.

#### **B. Discovery that Remains**

The parties have also noticed, but not taken, the following depositions: Art Hamilton, Anastacia Peterson, Daniel Simic, Ashley Kerr, Esq., Avi Dabir, David Ma, Dennis Drazin, Esq., Ramnik Arora, Sam Bankman-Fried, and experts Joe Leauanae and Randy Stollar.

#### **C. Reason for the Requested Extension**

After the filing on March 8, 2024, of Dr. Mintas' Motion to Extend the April 1, 2024

1 Discovery Deadline, (ECF No. 488) and following the Court's order yesterday setting an expedited  
2 briefing schedule to be completed by March 15, 2024, Mr. Popok reached out to defense counsel  
3 and proposed a resolution. Counsel then met and conferred and agreed to the details of the Joint  
4 Stipulation below. The extension of the deposition-only discovery deadline, will permit the  
5 parties to take the depositions without overlap, in an orderly and efficient way that will  
6 accommodate the schedules of counsel, parties, and witnesses. Additionally, the limitation on the  
7 noticing of any additional depositions will ensure that oral discovery is completed in a timely  
8 manner. Pursuant to the parties' agreement, however, depositions of these parties could be taken  
9 after the extended deadline if the depositions are delayed as a result of any motion for protective  
10 order that has been or may be filed in the future, but only on that condition.

11 **D. Proposed Stipulation**

- 12 1. The deadline to complete the depositions of any deponents that the Parties noticed  
13 on or before January 15, 2024, will be extended from **April 1, 2024** to **May 10,**  
14 **2024.**
- 15 2. The current dispositive motions deadline of **May 1, 2024** will be extended to **June**  
16 **12, 2024.**
- 17 3. The current deadline for a pretrial order of **June 3, 2024** will be extended to **July**  
18 **15, 2024.**
- 19 4. The parties agree that only those depositions that were the subject of the Parties'  
20 prior stipulation and Court order (ECF No. 449) that had been noticed, including  
21 those that were subject to the recent letters rogatory and protective order motion  
22 practice, will be conducted during the extended discovery period;
- 23 5. The Parties agree that no new depositions will be permitted;
- 24 6. The Parties agree that no other written discovery will be propounded to either side  
25 during the extended deposition-only discovery period;
- 26 7. The Parties agree that any motions to compel about prior discovery issues will be  
27 filed in advance of the May 10, 2024 discovery deadline so that full briefing on the  
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issue is completed by that extended deadline; and

8. Mintas reserves the right to seek a future extension of discovery for good cause, and PlayUp US and Simic reserve their right to oppose any such extension on any grounds.

Respectfully submitted,

Dated this 14th day of March 2024.

THE QUINLAN LAW FIRM LLC

/s/ Eric T. Schmitt

William J. Quinlan (pro hac vice)  
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*Attorneys for Dr. Laila Mintas*

Dated this 14th day of March 2024.

ZUMPARO PATRICIOS POPOK & HELSTEN,  
PLLC

/s/ Michael S. Popok

Michael S. Popok  
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*Attorneys for PlayUp, Inc. and Daniel Simic*

**ORDER**

IT IS SO ORDERED.

Dated March 18, 2024

It is time for discovery to wrap up so the case can move on to the merits phase. Counsel must take all reasonable steps to meet the deadlines set herein. **THE COURT IS NOT INCLINED TO GRANT FURTHER EXTENSIONS.** The motion to extend at Docket No. 1488 is **DENIED** as moot.

  
UNITED STATES MAGISTRATE JUDGE